

Privacy Policy

Effective date: January 07, 2024

QELA (“**we**”, “**us**”, “**our**”, “**QELA**”, “**Service**”) respects the privacy of our users (supporters) and we are committed to protecting it through our compliance with this privacy policy (“**Privacy Policy**”), which describes the types of information we may collect from you or that you may provide when you use our www.qela.app and admin.qela.tech websites (“**Website**”), or our services (collectively, “**Services**”) and our practices for collecting, using, maintaining, protecting and disclosing that information. This Privacy Policy applies to the data collected by us, or those working on our behalf, through information you enter or from the imported data from authorized and approved sources. It does not apply to data collected through other sites, products, or services not approved by us.

By using or accessing our Website or the Services in any manner, you acknowledge that you accept the practices and policies described in this Privacy Policy, and you hereby consent that we may collect, use, and share your information as described herein. If you do not agree with our policies and practices, your choice is not to use our Website or our Services. We collect your personal information in order to deliver our Website and Services to you more efficiently. If you do not provide us with the necessary personal information, we will not be able to deliver all the features of our Services and/or Website to you as intended. Remember that your use of our Services is at all times subject to our Terms of Service (the “**Terms**”), which incorporates this Privacy Policy. Any capitalized terms we use in this Privacy Policy without defining them have the definitions given to them in the Terms.

What does this Privacy Policy Cover?

This Privacy Policy applies to information we collect:

- In email, text and other electronic messages between you and us.
- When and where available, through mobile and desktop applications, which provide dedicated non-browser-based interaction between you and us.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this Privacy Policy.

This Privacy Policy does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by us or any third party (including our affiliates and subsidiaries); or
- Any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on our website.

This Privacy Policy covers our treatment of personally identifiable information. This is information which may be connected to you specifically as the individual to whom the information relates. Such information may include name, mailing address, email address, telephone number, or any other information defined as personally identifiable information (or similar term) by applicable laws (“**Personal Information**”). Personal Information does not include your personally identifiable information that has been deidentified, pseudonymized, anonymized, aggregated and/or otherwise processed so as to be unidentifiable (i) in such a way that the data can no longer be attributed to a specific individual, or (ii) in such a way that the data can no longer be attributed to a specific individual (by reasonable means) without the use of additional information, and where such additional information is kept separate and under adequate security to prevent unauthorized re-identification of a specific individual such that one could not, using reasonable efforts, link such information back to a specific individual (the foregoing being referred to as “**De-Identified Personal Information**”).

We gather various types of Personal Information from our users, as explained in more detail below, and we use this Personal Information internally in connection with our Services, including:

- to personalize and improve our services;
- to allow you to set up a user account and profile;
- to contact you and allow other users to contact you;
- to fulfill your requests for certain products and services;
- to provide and improve the Services; and
- to analyze how you use the Services.

In certain cases, we may also share some Personal Information with third parties, but only as described below.

Changes to Our Privacy Policy

We're constantly working to improve our Services, so we may need to change this Privacy Policy from time to time as well, but we will alert you to changes by placing a notice on our Website or as part of the Services, by sending you an email, and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

Information We Collect About You and How We Collect It

We collect several types of information from and about users, including Personal Information that is about you but individually does not identify you, such as, time and date of visits to our Website, etc.; and/or, about your internet connection, the equipment you use to access our Website and usage details.

We may collect the following personal information from you:

- Your name
- Your email address
- Your phone number
- Your address
- Your passport or ID card data
- Other unique identifiers

We collect this information:

- Directly from you when you provide it to us. When you sign up for the Services, you provide us with information such as your name and email address.

When you undergo verification, you provide us with data such as a selfie with the first page of your passport or ID card. We do not retain the selfie with the first page of your passport or ID card that you provide during the verification process. Such data is automatically deleted upon confirmation/rejection of the verification. The provision of data, such as a selfie with the first page of your passport or ID card, during the verification process is optional.

- Automatically as you navigate through the site. Information collected automatically may include usage details and information collected through cookies and other tracking technologies.
- From third parties, for example, our business partners.

Information You Provide to Us. The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, posting material or requesting further services, fundraising and transaction payment data. We may also ask you for information when you report a problem with our Website. You are responsible for obtaining any consents and permissions for the collection, storage, processing, disclosure, and transfer of any such information required by applicable law or to allow us to use, process, transfer, etc., such information as set forth in this Privacy Policy (and as revised hereafter).
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Your search queries on the Website.

You also may provide information to be published or displayed (hereinafter, “**posted**”) on public areas of the Website, or transmitted to other users of the Website or third parties (collectively, “**User Content**”). Your User Content is posted on and transmitted to others at your own risk. We cannot control the actions of other users of the Website with whom you may choose to share your User Content. Therefore, we cannot and do not guarantee that your User Content will not be viewed by unauthorized persons.

Information We Collect Through Automatic Data Collection Technologies. As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including:

- Details of your visits to our Website, including, but not limited to, geolocation data, traffic data, logs and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking).

The information we collect automatically is statistical data and may include Personal Information, but we may maintain it or associate it with Personal Information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including, but not limited to, by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize and improve our Website.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include cookies and pixel tracking. Each of these is discussed below.

Cookies (or browser cookies)

A cookie is a small file placed on the hard drive of your computer or mobile device. It may contain certain data, including, but not limited to: the name of the server that has placed it there, an identifier in the form of a unique number, and, an expiration date (some cookies only). Cookies are managed by the web browser on your computer (Internet Explorer, Firefox, Safari or Google Chrome).

Pixel Tracking. In addition to using Cookies, the Website may employ “pixel tracking”, a common process which may be used in connection with advertisements on other sites. Pixel tracking involves the use of pixel tags that are not visible to the user and consist of a few lines of computer code. Pixel tracking measures the effectiveness of advertisements and compiles aggregate and specific usage statistics. A “pixel tag” is an invisible tag placed on certain pages of websites that is used to track an individual user’s activity. We may access these pixel tags to identify activity and interests that may allow us to better match our goods, services, and other offers with your interests and needs. For example, if you visit our Website from an advertisement on another website, the pixel tag will allow the advertiser to track that its advertisement brought you to the Website. If you visit our Website, and we link you to another website, we may also be able to determine that you were sent to and/or transacted with a third-party website. This data is collected for use in our marketing and research.

Third-party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers and application providers. These third parties may use cookies alone or in conjunction with other tracking technologies to collect information about you when you use the Website. The information they collect may be associated with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

Financial information connected to payments may be collected or stored by a third-party payment processor and is subject to their terms and policies.

User verification

QELA prioritizes user verification for security, authenticity, and trust. This involves a two-step verification process:

Phone Number Verification: We will send a six-digit code to the number specified during registration

Photo Verification: You must submit a clear selfie with the first page of your passport or ID card. The photo should be unedited, and passport inscriptions must be legible.

User Verification Importance:

User verification plays a crucial role in ensuring the safety and trustworthiness of QELA. This process effectively prevents the creation of fake profiles, bots, and scammers, thereby guaranteeing genuine connections and fostering user confidence in the application.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any Personal Information:

- To present our Website and its contents to you.
- To provide you with information, products or services that you request from us.
- For analyzing how the Service is used, diagnosing service or technical problems, maintaining security, and personalizing content.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account, including expiration and renewal notices.
- To operate, maintain, and provide to you the features and functionality of the Service.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website, our policies, terms or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Website.
- In any other way we may describe when you provide the information.

We use cookies and log file information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information; (c) monitor the effectiveness of our Service; (d) monitor aggregate metrics such as total number of visitors, traffic, and demographic patterns; (e) diagnose or fix technology problems reported by our users or engineers (f) help you efficiently access your information after you sign in; (h) enhance our Website security.

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you.

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

How Long Do We Keep Your Personal Information?

We will keep your personal information as long as it is necessary for the purpose for which we obtained it, unless you ask us to delete it at an earlier time. Our retention periods are based on business needs and legal requirements, and your information that is no longer needed is either irreversibly anonymised or destroyed securely.

If you ask us to delete your personal information at an earlier time, we will delete all information we hold on you within 30 days, save for information which is reasonable for us to retain in order to operate our Website or information we are required to retain by law.

Following termination or deactivation of your account, we may retain your profile information and all information posted to public areas of the Service.

How We Share Your Information

Personal Information: We will never rent or sell your Personal Information to others, other than as noted below under “Disclosure/Assignment of Your Personal Information”. We may share your Personal Information with third parties for the purpose of providing or improving the Service to you. If we do this, such third parties’ use of your Personal Information will be bound by obligations of confidentiality. We may store Personal Information in locations outside our direct control (for instance, on servers or databases located or co-located with hosting providers). Any Personal Information or content that you voluntarily disclose for posting to the Service becomes available to the public, as controlled by any applicable privacy or website customization settings. To change your privacy settings on the Service, you may visit your QELA account settings page. If you remove information that you posted to the Service, copies may remain viewable in cached and archived pages of the Service, or if other users have copied or saved that information.

From time to time, we may run contests, special offers, or other events or activities (“**Events**”) on the Service together with a third party partner. If you provide information to such third parties, they may use it for the purpose of that Event and any other use to which you consent. We cannot control third parties’ use of your information. If you do not want your information to be collected by or shared with a third party, you can choose not to participate in these Events.

Except as otherwise described in this Privacy Policy, we will not disclose Personal Information to any third party unless required to do so by law, court order, legal process, or subpoena, including to respond to any government or regulatory request, or if we believe that such action is necessary to (a) conform to the law, comply with legal process served on us or our affiliates or partners, or investigate, prevent, or take action regarding suspected or actual illegal activities; (b) to enforce our Terms (including for

billing and collection purposes), take precautions against liability, to investigate and defend ourselves against any third-party claims or allegations, or to protect the security or integrity of our site; and (c) to exercise or protect the rights, property, or personal safety of QELA, our users or others.

De-Identified Personal Information: We may share De-Identified Personal Information (such as anonymous usage data, referring/exit pages and URLs, platform types, number of clicks, etc.) with interested third parties to help them understand the usage patterns for certain Services.

Your Consent to Our Disclosure/Assignment of Your Personal Information. You consent to our disclosure of your Personal Information and other information to a potential buyer or other successor for the purpose of considering a merger, divestiture, restructuring, reorganization, dissolution, or sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which Personal Information held by us about our Website users is among the assets transferred. You agree to and do hereby consent to our assignment, conveyance, or transfer (whether by contract, merger or operation of law) of rights to your Personal Information and other information, with or without notice to you and without your further consent.

Security

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration and disclosure. All personal information you provide to us is stored on our secure servers (or those of our service providers) behind firewalls. We may store, retrieve, access, and transmit your personal information. Any payment transactions will be performed using our third party payment processors, who will use appropriate security procedures.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of the Website or Services, you are responsible for keeping this password confidential. You should not share your password with anyone. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do try to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to us or which we obtain. Any transmission of Personal Information is at your own risk. Unauthorized entry or use,

hardware or software failure, and other factors, may compromise the security of user information at any time. We are not responsible for circumvention of any privacy settings or security measures contained on the Website or used with our Services.

What You Can Access

Through your account settings, you may access, and, in some cases, edit or delete the following information you've provided to us:

- name and password
- email address
- user profile information, including any content you have uploaded to the Services

The information that you can view, update, and delete may change as the Services change. If you have any questions about viewing or updating information we have on file about you, please contact us at hello@qela.app.

Notices and Opting Out

By providing us with your email address (including by “following,” “liking,” linking your account to the QELA service or other Services, etc., on a third party website or network), you consent to our using the email address to send you Service-related notices, including any notices required by law, in lieu of communication by postal mail. You also agree that we may send you notifications of activity on the Service to the email address you give us, in accordance with any applicable privacy settings. We may use your email address to send you other messages or content, such as, but not limited to, newsletters, additions or changes to features of the Service, or special offers. If you do not want to receive such email messages, you may opt out by emailing us your request at hello@qela.app. Opting out may prevent you from receiving email messages regarding updates, improvements, special features, announcements, or offers.

You may be able to add, update, or delete information as explained above. You may request deletion of your account by emailing us at hello@qela.app.

Data Protection Rights Under General Data Protection Regulation (GDPR)

If you are a resident of the European Union and European Economic Area, you have certain data protection rights, covered by GDPR:

- **The right to be informed:** You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Privacy Policy.
- **The right of access:** You have the right to obtain access to your information (if we're processing it), and other certain other information (similar to that provided in this Privacy Policy). This is so you're aware and can check that we're using your information in accordance with data protection law.
- **The right to rectification:** You're entitled to have your information corrected if it's inaccurate or incomplete.
- **The right to erasure:** This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
- **The right to restrict processing:** You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.
- **The right to data portability:** You have rights to obtain and reuse your personal data for your own purposes across different services. Eg, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.
- **The right to object:** You have the right to object to certain types of processing, including processing for direct marketing (which we do only with your consent).

QELA sometimes transfers personal data to a third party for the purposes of sub-processing. When we do make such transfers, we limit them as follows: (i) we transfer data only for limited and specified purposes, consistent with the consent you have provided; (ii) we ensure that the sub-processor is obligated to provide at least the same level of privacy protection required by the Privacy Shield Principles; (iii) we take reasonable and appropriate steps to ensure that the sub-processor effectively processes the personal information transferred in a manner consistent with our obligations under the Privacy Shield Principles; (iv) we require the sub-processor to

notify us if it makes a determination that it can no longer meet its obligation to provide the same level of protection as is required by the Privacy Shield Principles; (v) if we receive such notice, we take reasonable and appropriate steps to stop and remediate any unauthorized processing;

In the context of an onward transfer to a third party sub-processor, QELA remains responsible for the processing of personal information it receives under the Privacy Shield if the sub-processor processes such personal information in a manner inconsistent with the Principles, unless we can prove that we are not responsible for the event giving rise to the damage.

Contact Information

To ask questions or comment about this Privacy Policy and our privacy practices, contact us at: hello@qela.app